ODOR IMPACT MINIMIZATION PLAN

September 2016

Project Name:	Residuals Recovery Group (RRG)/Ontario Agricultural Commodities (OAC) Food Materials Research Operation
Operator:	Ontario Agricultural Commodities PO Box 79200 Corona, CA 92877 951-788-6042
Property Owner:	Gary Dou/Golden Ontario Holdings 14240 Sapphire Hill Ln. Chino Hills, CA 91709 909-591-6389
Assessor's Parcel Number:	1053-391-01
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Regulatory Contact:	San Bernardino County Department of Public Health Division of Environmental Health Services LEA/Waste Management Program 800-442-2283/909-387-4323 (Fax)

BACKGROUND

The Project is located on approximately 2.5 acres on the northwest section of a 40 acre permitted compost site within the SP(AG) zoning district in the City of Ontario. The project is designed to accept loads of food materials for the immediate processing through a multiple stage machine that will effectively dry the material into a finished, stable product. The machine is designed to accept up to 100 tons per day.

The project shall comply with the policies of the Ontario Municipal Code and the Policy Plan (General Plan), as well the provisions of the California Code of Regulations (14CCR) Title 14, Section 17863.4.

ODOR MONITORING PROTOCOL

17863.4 (1) An odor monitoring protocol which describes the proximity of possible odor receptors and a method for assessing odor impact at locations of the possible receptors; and

The facility is located in southern part of the City of Ontario. Adjacent and surrounding uses are all agricultural related such as dairy and cattle farming. Typical odors associated with farming industries include animal manure, animal feed, and soil amendments for crops. The proposed facility is a half-mile away from the nearest residential areas. It is anticipated that the facility will not generated odors above and beyond what is currently being generated within the area, as a result of a variety of agricultural uses.

In the even that odors are detected, however, facility workers may leave the site to determine the extent of odor migration. In the even that odors are detected, the facility operator will implement the following practices:

A determination will be made regarding the source of the odor (e.g. incoming food materials).

Once the source is identified, corrective actions will be taken to mitigate the odor.

DESCRIPTION OF METEOLOGICAL CONDITIONS

17863.1 (2) a description of meteorological conditions effecting migration of odors and/or transport of odor-causing material offsite. Seasonal variations that effect wind velocity and direction shall also be described; and,

Climatic conditions in western San Bernardino County are not expected to significantly affect the operations. Western San Bernardino County's climate can be characterized as Mediterranean with moderate to hot temperatures. These temperatures range from a monthly average low of 40.0 F in December to a monthly average high of 91.6 F in July and August, reported by the Western Regional Climate Center for the period of July 1,

2948 to July 31, 1988 at the Corona Station, latitude N33 52' at elevation of 700 feet above mean sea level (MSL), approximately 10 miles from the site. Rainfall is seasonal; approximately 97 percent of the precipitation occurs from September through April. Snowfall is unusual at the site.

The prevailing wind direction is from the west, southwest throughout the year, with an occasional easterly flow associated with Santa Ana conditions occurring during the fall months.

COMPLAINT RESPONSE PROTOCOL

17863.1 (3) a complaint response protocol; and

In the event of an odor complaint, the operator will implement the following protocol:

- Identify the location of the complainant.
- Identify the potential source of the odor.
- Mitigate the potential source of the odor through one or more of the following:
- Curtail the activity creating the odor.
- If the odor is unprocessed food materials, immediately process the material to remove the odor.
- If the odor is caused by liquid storage tanks, drain the tanks with a water truck to use as dust control on larger site.
- Remove the material creating the odor from the site and dispose of it.
- Contact the complainant with the results of the investigation and action taken. If the complaint was received by the LEA, notify the LEA of the actions taken.
- Log the incident in the facility's complaint log including complainants name and address, actions taken to address the complaint and any future follow up actions to be taken.

DESIGN CONSIDERATIONS TO MINIMZE ODORS

17863.1 (4) a description of design considerations and/or protected ranges of optimal operation to be employed in minimizing odor, including method and degree of aeration, moisture content of materials, feedstock characteristics, airborne emission production, process water distribution, pad and site drainage and permeability, equipment reliability, personnel training weather event impacts, utility service interruptions, and site specific concerns; and,

Feedstock Characteristics: The facility receives the following materials:

- Food materials: Food materials includes, but is not limited to, food waste from food facilities as defined in Health and Safety Code section 113789 and 111955.

Food materials are delivered to site in closed trucks or containers. All food materials will be unloaded in cement pits and loaded into the machine within 2 hours of its delivery

Airborne Emission Control: Potential airborne emissions from the operation may originate from the materials while in storage or during processing. Since the food materials will be in storage less than 2 hrs. after delivery, it will minimize the opportunity for anaerobic conditions that lead to emission issues. As the food materials are loaded into the machine, the majority of the processing takes place within an enclosed barn. Odors will be continually monitored by staff as the materials are conveyed.

In the event of an odorous load or a problem with the machine that leads to an anaerobic state in the pit, the load can be removed and hauled to an approved disposal facility.

Water Quality: The active processing (unloading, loading, machine operation) of the materials occurs on a hardened surface paved in concrete and sloped to collect leachate in an underground drain system. Any collected leachate is drained to a series of sealed holding tanks and is either reapplied as dust control or to compost piles on the site as a source of moisture. The drain system is cleaned on a regular basis to prevent odors.

Equipment Reliability: The equipment is well maintained and reliable. Equipment fueling, maintenance and repairs are done onsite with additional parts in reserve. In the event of severe mechanical failure on the machine, the owner of the machine technology is nearby (Costa Mesa) and can provide back up and temporary equipment on short notice.

Personnel Training: All site manager and operating personnel receive training on the proper processing of incoming material, methods to minimize odor production, and compliance with the requirements of Title 14 CCR.

Weather Event Impacts: In the event of severe weather conditions, natural events or disasters or other events that could severely disrupt operations and create potential odor problems, the facility will cease operations until conditions improve that will allow normal operations.

Utility Service Interruptions: In the event of a power failure, a backup diesel-powered generator will be used to power the machine or the facility will cease operations until the power is restored.

OPERATING PROCEDURES TO MINIMIZE ODORS

17863.1 (5) a description of operating procedures for minimizing odor, including aeration, moisture, management, feedstock quality, drainage controls, pad maintenance, wastewater pond controls, storage practices (e.g. storage time and pile geometry), contingency plans (i.e. equipment, water, power, and personnel), biofiltration, and tarping.

Feedstock Management: All incoming food materials will be processed within 2 hrs. of delivery. It will be loaded into the machine which will be able to treat and dry the material within 30 minutes of being loaded. The end product will be a dry (>5%), stable, finished material.

Drainage Controls: The entire operation occurs on cement lined pits or a concrete pad that is property sloped to allow for good drainage into a sealed tank system. The leachate is drained from the tanks and reapplied to compost piles or as a source of moisture or as dust control on the larger site.

Storage Practices: The facility will not allow for long-term storage of incoming food materials or finished product. The pits that the food materials are unloaded in only have capacity for approximately 100 cubic yards of material. All incoming food materials will be loaded into the machine within 2 hrs. of delivery.

Contingency Plans: All processing equipment is maintained per manufacturer standards. Back up equipment is locally available and spare parts will be stored onsite.

ANNUAL REVIEW OF OIMP

17863.4 (d) The odor impact minimization plans shall be reviewed annually by the operator to determine if any revisions are necessary.

The OIMP will be reviewed annually by the operator, and revised as necessary.

A copy of this OIMP will be kept at the facility's administrative office. The OIMP will be revised within 30 days to reflect significant changes to operations that affect the OIMP, with a copy provided to the LEA, when appropriate.